

## UNITED STATES DISTRICT COURT

for the

Northern District of California

**FILED**

Apr 29 2025

Mark B. Busby  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLANDUnited States of America  
v.

Case No. 4:25-mj-70488-MAG

Erik Antonio Contreras

\*\*\*REDACTED VERSION\*\*\*

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 27, 2023 in the county of Alameda in the  
Northern District of California, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. SECTIONS 2252(a)(4)  
(B) and (b)(2)

Possession of Child Pornography

Maximum Penalties:

20 years imprisonment; \$250,000 fine;  
Supervised release: 5 years minimum, life maximum;  
Special assessment of \$17,000; Restitution; Forfeiture

This criminal complaint is based on these facts:

See attached affidavit of FBI SA Seth Witten

☒ Continued on the attached sheet.Approved as to form /s/ Zachary Glimcher  
SAUSA Zachary M. Glimcher/s/ Seth Witten*Complainant's signature*

Seth Witten, FBI SA

*Printed name and title*

Sworn to before me by telephone.

Date: 04/29/2025City and state: Oakland, CA*Judge's signature*

Donna M. Ryu, Chief Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Seth Witten, being first duly sworn, hereby depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is made in support of an application under Rule 4 of the Federal Rules of Criminal Procedure for a Criminal Complaint and Arrest Warrant authorizing the arrest of Erik Antonio Contreras (“CONTRERAS”) for one count of possession of child pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2), in the Northern District of California on October 27, 2023.

2. The facts in this affidavit come from my personal observations, my training and experience, and information obtained from other law enforcement personnel and witnesses. When recounting information learned from others or conversations with others, I have summarized that information and not recounted anything verbatim. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and does not set forth all of my knowledge about this matter.

3. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since August 2009. I am currently assigned to the San Francisco Field Office, Oakland Resident Agency, to a squad that investigates crimes against children, including those committed via the Internet or computers. Since joining the FBI, I have investigated, among other things, federal criminal violations related to child pornography and the sexual exploitation of minors. I have received on-the-job training in the area of child pornography and child exploitation and have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media. I have participated in the execution of numerous federal search warrants conducted by the FBI and in the seizure of computer systems and other types of digital evidence. In addition, I am a certified Digital Extraction Technician (“DEXT”) with the FBI, having been certified in February 2020, after 80 hours of training. As a DEXT, I am authorized to conduct digital analysis of evidence specific to crimes against children

investigations, and have utilized this authorization for the forensic digital review of materials related to child pornography and the sexual exploitation of minors.

4. I am an “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7). I am empowered by law to conduct investigations of, to execute search warrants, and to make arrests for offenses of Federal law, including offenses related to child pornography.

### **RELEVANT STATUTES**

5. Pursuant to 18 U.S.C. § 2252(a)(4)(B) and (b)(2), it is unlawful for any person to knowingly possessing or knowingly accessing with intent to view, or attempting to do so, any material that contains a visual depiction of and involving the use of a minor engaging in sexually explicit conduct, that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

### **FACTS ESTABLISHING PROBABLE CAUSE**

6. Prior to September 10, 2023, a law enforcement officer acting in an undercover capacity (OCE) posted messages on an online bulletin board known to the OCE as being frequented by individuals with a sexual interest in children and incest. On the online bulletin board, the OCE posted his usernames and contact information associated with communication platforms the OCE maintained for direct communication, such as a Telegram account linked to the OCE.

7. On or about September 10, 2023, OCE received a direct message via the OCE’s Telegram account from an individual with a listed username of “Ant Cera” (later determined to be Erik Antonio CONTRERAS) and a linked phone number of 510-\*\*\*-8312. <sup>1</sup> CONTRERAS

---

<sup>1</sup> From my training and experience, I know that Telegram is a social media and instant messaging platform, that uses the internet, allowing users to exchange messages, share media and files, and hold private and group chats, video calls, and livestreams.

identified himself as having seen OCE's online posts and advised he resided in Hayward, California.

8. During the course of the Telegram conversation, CONTRERAS advised his first name was Anthony, that he is 6 feet tall, and a 32-year-old who works construction. CONTRERAS also advised he used to live in the Diamond district of Oakland. He also provided his wife's name, her age, height, and that she works for the same construction company as CONTRERAS does. CONTRERAS added that his wife is [REDACTED] and has a sister who is 11 years old.

9. From on or about September 11, 2023 and continuing to October 25, 2023, OCE and CONTRERAS communicated via Telegram, part of which is transcribed below:

OCE: What sort of incest are you into?

CONTRERAS: All kinds

...

OCE: What about ages? Have a limit on that? Preference?

CONTRERAS: Double digits at least

CONTRERAS: But I could be swayed if they've got a sexy body lol

....

OCE: You interested for jerk off purposes or actually curious? Usually share with other

parents or people who want to meet up with me and daughter

CONTRERAS: Actually curious

CONTRERAS: I want to be involved if possible

OCE: I like when I can share her. So far it's only been with one person who also had a daughter, but I'm open if someone is kind and gentle and trustworthy

....

OCE: [sent an image of an age regressed law enforcement female in a skirt bent over purported to be OCE's minor daughter]

CONTRERAS: Oh fuck

CONTRERAS: Godamn

OCE: Mmm, would love to see you defile her

CONTRERAS: Ugh I wanna fuck that little ass of hers

CONTRERAS: Have you watch as my cock slides in and out of her mouth

CONTRERAS: And pussy

....

CONTRERAS: I gotta know

CONTRERAS: How old?

OCE: How old you think lol?

CONTRERAS: 13?

OCE: Almost. She's 12

CONTRERAS: Damn she's at the perfect age

....

CONTRERAS: I want her so bad lol

....

CONTRERAS: [sent an animated image of penis ejaculating into the mouth of a topless female]

CONTRERAS: I want that to be her when I blow my load in her mouth

CONTRERAS: I'll save up a good one for her

....

OCE: You sure you are ok with a 12 year old? I don't. Want to show my dau your dick and get her excited for nothing

CONTRERAS: If you are ok with it

....

OCE: Ideally what would you want to do with her?

CONTRERAS: Oral for sure

CONTRERAS: Or whatever the mood calls for

11. CONTRERAS further provided OCE pictures of his genitalia and asked OCE to provide those pictures to his daughter. CONTRERAS requested OCE obtain pictures from his daughter of her underwear. CONTRERAS requested OCE daughter's phone number so that he could direct message her himself.

12. CONTRERAS advised that after communicating over video with OCE and his fictitious minor daughter, he would be willing to meet in person. When asked what he would want to do upon meeting up, he advised he and his significant other, would have intercourse next to OCE and OCE's daughter. When asked if he would want to have intercourse with OCE's daughter, CONTRERAS advised "I want to lol." When asked if CONTRERAS would want to have intercourse with OCE's daughter or just watch the OCE have intercourse with her, CONTRERAS advised "I wanna do both lol."

13. CONTRERAS sent OCE various pictures purported to be of himself and his wife, some of which included sexual acts. CONTRERAS provided OCE one picture displaying an adult female with dark hair hugging an adult male. Only the adult male's chin is visible, which shows a long, dark beard. The background of the picture appears to be visually similar to other pictures CONTRERAS sent OCE purporting to be of him and his wife. CONTRERAS provided two pictures to the OCE of CONTRERAS's wife and another adult female in the bathtub with a minor female. CONTRERAS advised the minor female was 4-years old and the daughter of the other female. The two adult females and the minor female all appear to be nude. CONTRERAS advised all adults were on "blow and molly" at the time. CONTRERAS noted he watched as they all bathed together. CONTRERAS also advised that the adult female and her 4-year old

daughter have spent time with CONTRERAS and his wife in the past, with the 4 year old often naked during those times.

14. Additionally, CONTRERAS advised he maintains a private Snapchat account, and requested OCE's Snapchat account information so that he could provide an invitation. After providing the requested information, OCE received a Snapchat invite from Snapchat user "airwreck\_510", aka Airwreck Oak\_fzj80." After accepting the invitation, OCE observed sexual content under the airwreck\_510 Snapchat account that was visually similar to that shared by CONTRERAS to OCE via Telegram.

15. On September 12, 2023, a subpoena was issued to AT&T for records related to phone number 510-\*\*\*-8312, the phone number associated with CONTRERAS's Telegram account. On September 12, 2023, AT&T provided a response to the subpoena with the following subscriber details:

Erik A Contreras

\*\*\*67 \*\*\*\* St., Hayward, CA 94541

Econ[REDACTED]@yahoo.com

Account status active since 2019

16. On September 12, 2023, a subpoena was issued to Snapchat for records related to Snapchat account airwreck\_510. On September 13, 2023, Snapchat provided a response to the subpoena with the following account details:

Verified email address: Econtreras1990@yahoo.com

Verified phone number: 510-\*\*\*-8312

Created date June 22, 2016

Last activity September 12, 2023

17. An internet search was conducted in October 2023 for Erik CONTRERAS. The internet search identified a LinkedIn profile for an Erik CONTRERAS, with a listed job title of Lead Facilities Technician with \*\*\* in Hayward, California. Under the LinkedIn details, CONTRERAS describes his work experience as having been in commercial and residential construction for 8 years. The LinkedIn profile includes a photo, which shows an adult male with a long dark beard.

18. Additional online searches in October 2023 identified a possible cohabitant to CONTRERAS, an adult female<sup>2</sup>.

19. A DMV search for Erik CONTRERAS conducted in October 2023 provided a date of birth of [REDACTED], 1990, and a full name of Erik Anthony CONTRERAS. DMV records list the \*\*\*67 \*\*\*\* St., Hayward, CA 94541 as the address for CONTRERAS as of November 2021. CONTRERAS' listed height is 6' 1" and listed weight as 200 pounds. The DMV photo is of a male with a long dark beard.

20. A DMV search for the adult female provided a date of birth of [REDACTED], and a full name. DMV records list the \*\*\*67 \*\*\*\* St., Hayward, CA 94541 as the address for her as of September 2022. Her listed height is 5 feet. The DMV photo appears to be similar in appearance to the images shared by CONTRERAS of his wife.

21. Surveillance was conducted in the vicinity of the \*\*\*67 \*\*\*\* St., Hayward, CA 94541 address between September 26, 2023, and September 28, 2023. During that period, surveillance identified individuals who appeared physically similar to CONTRERAS and his wife exiting the residence.

22. On October 27, 2023, pursuant to a Federal Search Warrant signed and authorized on October 26, 2023, a search was executed at \*\*\*67 \*\*\*\* St., Hayward, CA 94541, during

---

<sup>2</sup> While the name of this adult female does not match the name CONTRERAS provided as his wife's name in previous chats, her DOB and ethnicity are consistent with what CONTRERAS previously provided in chats to the OCE.



which CONTRERAS and his wife were present. An Asus laptop, REVVL cellphone, Samsung cellphone, and iPhone cellphone were seized as part of the search warrant.

23. Following the completion of the search, a forensic analysis was completed on the seized electronic devices. The seized iPhone was observed to have a listed account registration info for CONTRERAS and had an assigned phone number of 510-\*\*\*-8312. Furthermore, the iPhone was found to have media files that appeared identical to those shared with the OCE.

24. Additionally, approximately 31 image files and 15 video files were observed that were consistent with child pornography. This included one video of a minor female who appears between 5 and 8 years old performing oral sex on an adult male penis and vomiting from the action and a video of a minor female who appears to be less than 2 years old being anally penetrated by an adult male penis.

25. The iPhone was further found to contain the application Session. Within Session, the account holder had a screen name of “Ant Cera” where private conversations were observed. One conversation was with a user with a screenname of “Ynglove”, where sexually suggestive images of minor females were shared, to include images of minor females in underwear and bathing suits. During the discussion and the sharing of sexually suggestive images of minor females, CONTRERAS stated “I’d love to rub my dick in between some Young ass” and “rub over her tight little pussy.”

26. A forensic review of the Asus laptop revealed approximately 554 image files and 771 video files that were consistent with child pornography. This included a video of an infant female whose diaper is removed by an adult female and inserts ice cubes into the infant’s anus and vagina before the infant’s legs are bound and her mouth taped shut. The infant is then hung upside down with clothes pins affixed to her vagina and nipples and hot wax dripped onto her body. An additional video displayed an infant female with a pacifier in her mouth being ejaculated on by an adult male penis who then removes the pacifier to rub his semen into the

child's mouth. A third video was of a boy who appears under the age of two being anally penetrated by an adult male penis.

27. Based on my training and experience, I believe iPhone that CONTRERAS utilized to access and store child pornography was manufactured outside of the state of California; thus, the device recovered from CONTRERAS's residence in the Northern District of California had to travel in interstate and/or foreign commerce.

**CONCLUSION**

28. Based on the information above, there is probable cause to believe that on October 27, 2023, CONTRERAS possessed child pornography, in violation of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2), in the Northern District of California. Accordingly, I respectfully request that the Court issue the requested Criminal Complaint and Arrest Warrant.

Respectfully submitted,

/s/ Seth Witten  
SETH WITTEN  
Special Agent  
Federal Bureau of Investigation

Sworn to before me over the telephone and signed by me pursuant to Fed.R.Crim.P. 4.1 and 4(d)  
this 29th day of April, 2025.

  
\_\_\_\_\_  
HONORABLE DONNA M. RYU  
CHIEF MAGISTRATE JUDGE